Mark K. Silver COUGHLIN DUFFY LLP 350 Mt. Kemble Avenue P.O. Box 1917 Morristown, NJ 07962 (973) 267-0058

Robert R. Vieth (*Of Counsel*) Erin M. Watkins (*Of Counsel*) COOLEY LLP One Freedom Square – Reston Town Center 11951 Freedom Drive Reston, Virginia 20190 (703) 456-8000

Attorneys for Animal Welfare Institute

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

NADINE HEMY and NANCY CONNER, individually and on behalf of themselves and all others similarly situated,)))	
Plaintiffs,)	Civil Action No.: 3:11-cv-00888-FLW-LHG
v.)	ANIMAL WELFARE INSTITUTE'S NOTICE OF MOTION TO
PERDUE FARMS, INC.,)	INTERVENE AND STAY
ABC CORPORATIONS 1 through 10)	
and JOHN DOES 1 through 10,)	(Document Filed Electronically)
_)	•
Defendants.)	
	_)	

TO: David M. Wacksman 777 Terrace Avenue Third Floor Hasbrouck Heights, NJ 07601

Edward P. Boyle Michael C. Hartmere Venable LLP Rockefeller Center 1270 Avenue of the Americas Twenty-Fifth Floor New York, NY 10020 Jonathan K. Tycko Jeffrey D. Kaliel Tycko & Zavareei LLP 2000 L Street, N.W. Suite 808 Washington, DC 20036 Kathryn J. Levy The Humane Society of the United States 2100 L Street, N.W. Washington, DC 20037

Liza M. Walsh Rukhsanah L. Lighari Connell Foley LLP 85 Livingston Avenue Roseland, NJ 07068 Roger A. Colaizzi David D. Conway Venable LLP 575 7th Street, N.W. Washington, DC 20004

PLEASE TAKE NOTICE that on September 6, 2011 at 10:00 a.m. or as soon thereafter as counsel may be heard, the undersigned counsel for Animal Welfare Institute ("AWI") shall move in the United States District Court for the District of New Jersey for an Order allowing AWI to intervene in this matter and staying this case for sixty days.

PLEASE TAKE FURTHER NOTICE that in support of this motion, the undersigned relies on the accompanying Memorandum of Law in Support of Animal Welfare Institute's Motion to Intervene and Stay.

PLEASE TAKE FURTHER NOTICE that Oral Argument is requested if this motion is opposed.

Dated: August 4, 2011 Respectfully submitted,

/s/Mark K. Silver
Mark K. Silver, Esq.
COUGHLIN DUFFY LLP
350 Mt. Kemble Avenue
P.O. Box 1917
Morristown, NJ 07962
Telephone: (973) 267-0058

Facsimile: (973) 267-6442 msilver@coughlinduffy.com

Robert R. Vieth (*Of Counsel*) Erin M. Watkins (*Of Counsel*) COOLEY LLP 11951 Freedom Drive Reston, Virginia 0190-5656 Telephone: (703) 456-8000 Facsimile: (703) 456-8100

rvieth@cooley.com eestevez@cooley.com

Counsel for Animal Welfare Institute